

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

JAMIE J. ISRAEL,)
vs.)
Plaintiff,)
vs.)
MAYSVILLE R-1 SCHOOL DISTRICT)
BOARD OF EDUCATION, et al.,)
Defendant.)
Case No. 5:23-cv-06074

**PLAINTIFF'S 2nd MOTION FOR EXTENSION OF TIME OF 1 DAY TO
FILE SUGGESTIONS IN OPPOSITION TO DEFENDANT HESLINGA'S
MOTION TO DISMISS**

COMES NOW the Plaintiff, Jamie J. Israel, by and through her attorney of record, Brian J. Klopfenstein, and does hereby move this Honorable Court for an extension of 1 day to August 1, 2023 to file her Suggestions in Opposition to Defendant Heslinga's Motion to Dismiss. In support of her Motion, the Plaintiff does hereby state and allege:

1. Counsel for Plaintiff was part of the area which was hardest hit from the thunderstorms that went through the Kansas City area on July 30, 2023. Counsel's power went out at approximately 8:15 p.m. The power was not restored to the house until approximately 2:30 a.m.

2. In addition to losing power; counsel was also left to deal with the effects of the power outage. While the lights eventually came back on; the motor on the refrigerator never came back so counsel spent the morning dealing with that problem.

3. In the afternoon, after a quick conference telephone call, counsel was back cutting up tree branches that came down as well as cutting up tree branches and preparing them for yard waste pick up on August 1, 2023.

4. Counsel has been working on the response and can have the response filed by August 1, 2023. Unfortunately the duration and length of the storm shut down counsel's practice as he dealt with storm damage.

5. Plaintiff is praying the Court grant a 1 day extension to ensure the pleading is filed properly. Plaintiff also suggests that a 1 day delay will not prejudice or harm the defendants.

WHEREFORE, the Plaintiff prays the Court grant an extension of 1 day to August 1, 2023 to submit her Suggestions in Opposition to Defendant Heslinga's Motion to Dismiss.

Respectfully Submitted,

/s/ Brian J. Klopfenstein
BRIAN J. KLOPFENSTEIN #33722
215 Platte Clay Way, Suite B
Post Office Box 897
Kearney, MO 64060-0897
(816) 628-2800
(816) 628-2802 (FAX)
E-mail: brian@klopfensteinlaw.com
ATTORNEY FOR PLAINTIFF

Certificate of Service

Plaintiff hereby certifies that she provided a copy to all parties in interest contemporaneously with the filing of this motion on July 31, 2023.

/s/ Brian J. Klopfenstein
Attorney for Plaintiff